

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

KEVIN BROWN et al.,)	
)	
<i>Plaintiffs,</i>)	
)	Civil Action No. 16-cv-00242-JL
v.)	
)	
SAINT-GOBAIN PERFORMANCE)	
PLASTICS CORP. and GWENAEL)	
BUSNEL,)	
)	
<i>Defendants.</i>)	
)	

**SAINT-GOBAIN’S RESPONSE TO PLAINTIFFS’ MOTION TO WITHDRAW CLASS
REPRESENTATIVE AND NAMED PLAINTIFF**

On June 14, 2019, Plaintiffs moved to withdraw plaintiff Bridget Heard as a class representative and named plaintiff in the above captioned matter and dismiss her claims without prejudice. (Dkt. 177.) At the same time, Plaintiffs moved to amend the Master Consolidated Class Action and Individual Complaint (“Complaint”) (Dkt. 101) to remove this plaintiff from the case caption. If the plaintiff’s representative claims will be dismissed, Saint-Gobain does not oppose the withdrawal of Heard and the corresponding amendment to the Complaint. In doing so, however, Saint-Gobain does not concede the remaining allegations and statements made by Plaintiffs in the filing at issue.

Dated: June 28, 2019

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify on this 28th day of June, 2019, this document was filed through the Electronic Case Filing System of the United States District Court for the District of New Hampshire and will be served electronically by the Court to the Registered Participants identified in the Notice of Electronic Filing (NEF).

/s/ Bruce W. Felmly

Bruce W. Felmly